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14 [Additional Counsel on Next Page]

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17

18
19 GINA CARANO,

20 Plaintiff,

21 v.

22 THE WALT DISNEY COMPANY,
23 LUCASFILM LTD. LLC, and
24 HUCKLEBERRY INDUSTRIES (US)
25 INC.,

26 Defendants.
27
28

Case No. 2:24-cv-01009-SPG-SK

JOINT STIPULATION
REGARDING MOTION TO
DISMISS BRIEFING SCHEDULE
AND RULE 26 OBLIGATIONS

District Judge:

Hon. Sherilyn Peace Garnett

Magistrate Judge:

Hon. Steve Kim

ADDITIONAL COUNSEL

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STIPULATION

Plaintiff Gina Carano (“Plaintiff”) and Defendants The Walt Disney Company, Lucasfilm Ltd. LLC, and Huckleberry Industries (US) Inc. (collectively, “Defendants” and together with Plaintiff, the “Parties”) stipulate as follows:

WHEREAS, Plaintiff filed the Complaint in this action on February 6, 2024 (*see* ECF No. 1);

WHEREAS, Defendants waived service of the Complaint on February 9, 2024 pursuant to Federal Rule of Civil Procedure 4(d), making Defendants’ deadline to respond to the Complaint April 9, 2024 (*see* ECF No. 20);

WHEREAS, on April 2, 2024, the Parties participated in a conference of counsel pursuant to Local Rule 7-3 regarding Defendants’ contemplated motion to dismiss, asserting that the Complaint is barred by the First Amendment to the United States Constitution (the “Motion”);

WHEREAS, as the Parties were unable to reach a resolution that would eliminate the necessity for the Motion, Defendants have filed the Motion concurrently herewith;

WHEREAS, the Parties were able to reach agreement on the hearing date and briefing schedule for the Motion, which is laid out below and the Parties respectfully request be approved by the Court;

WHEREAS, the Parties further agree that Defendants’ Motion—if granted—would result in the dismissal of the Complaint, thereby eliminating the need for discovery and the obligations pursuant to Federal Rule of Civil Procedure 26(a)(1) and (f);

WHEREAS, the Parties respectfully request that the Court so-order the Parties’ briefing schedule and defer their Rule 26(a)(1) and (f) obligations and discovery for 30 days after the scheduled June 12, 2024 hearing (*i.e.* July 12, 2024) to provide the Court with an opportunity to consider and rule on the Motion, subject to the Parties’ ability to request additional time if appropriate.

1 Based on the foregoing, **IT IS HEREBY STIPULATED** by and between
2 the Parties, through their respective counsel of record, subject to the Court's
3 approval that:

- 4 1. Defendants' Motion is noticed for June 12, 2024.
- 5 2. Plaintiff's Opposition to Defendants' Motion is due by May 9, 2024.
- 6 3. Defendants' Reply is due by May 23, 2024.
- 7 4. Discovery and the Parties' obligations to conduct a Rule 26(f)
8 conference and exchange Rule 26(a)(1) disclosures are deferred until
9 July 12, 2024, subject to the Parties' ability to request additional time
10 if appropriate.

1 Dated: April 9, 2024

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1 Dated: April 9, 2024

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ATTESTATION

Pursuant to Local Rule 5-4.3.4(a)(2)(i), the filer attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: April 9, 2024

O'MELVENY & MYERS LLP

By: /s/ Daniel M. Petrocelli
Daniel M. Petrocelli